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August 28, 2025

VIA ECF

Honorable Rachel P. Kovner
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Charles Saldarriaga v. City of New York, et al.,
25-CV-1115 (RPK)(JRC)

Your Honor:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and the attorney assigned to represent defendants City of New York, Sergeant Detective William J. Planeta, Detective Eric Bolger, and Detective Leonardo Moscoso ("Defendants") in the above-referenced matter. Pursuant to Your Honor's Individual Practices, I write to respectfully request that the Court grant Defendants ten (10) excess pages for their anticipated fully dispositive motion to dismiss Plaintiff's Complaint, for a total page limit of thirty-five (35) pages. Plaintiff consents to this request.

The ten (10) excess pages requested by Defendants are necessary due to the number of defendants involved and to fully address the claims in Plaintiff's Complaint, which contains fifteen (15) causes of action encompassing approximately twenty-one (21) distinct claims. Many of these claims overlap factually but differ in their defenses and governing case law, making a thorough yet concise response unfeasible within the ordinary page limit. Further, given Plaintiff's *pro se* status and the Court's obligation to construe a *pro se* complaint liberally to raise the strongest arguments it can make, the ten (10) excess pages would ensure that no issue is left insufficiently addressed solely due to page limitations.

Defendants thank the Court for its time and consideration of this request.

Respectfully submitted,

Michael Futral /s/

Michael Futral
Assistant Corporation Counsel
Special Federal Litigation Division

Cc: **VIA ECF & FIRST CLASS MAIL**
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